

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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DISTRICT OF NEW JERSEY
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C.G.B.,

Plaintiff,

2017 AUG 29 P 3 21

v.

Case NO. 2:15-cv-03401-SDW-LDW

AIDA SANTALUCIA, et al.,

Defendants.

**MOTION TO INTERVENE AS THIRD PARTY PLAINTIFF FOR THE
PURPOSE OF UNSEALING DISCOVERY AND OTHER DOCUMENTS**

COMES NOW, Jeffrey Marc Siskind, Esquire, PRO SE, and moves to intervene as Third Party Plaintiff for the purpose of unsealing sealed discovery and other documents pertaining to Defendants, and states:

1. Intervenor is a Debtor in a Chapter 11 bankruptcy matter in the Southern District of Florida; case no. 13-13096-PGH.

2. In said case, BELMAR WINDS, INC. ("Belmar"), a Florida corporation whose sole officer and director is Teresa Santalucia, filed a proof of claim for more than \$700,000, to which Debtor timely objected.

3. During discovery undertaken by Debtor to prove that Belmar's claim was void, Intervenor discovered that Belmar is actually operated by Angela Khoroizian and her husband, Varoujan Khoroizian, and is their alter ego.

4. Intervenor also discovered that Angela Khoroizian has adopted an alias, and holds herself out as Aida Santalucia in order to secret information concerning her criminal history.

5. In the course of obtaining discovery, Debtor obtained information that several Defendants in the instant matter falsified numerous documents in order to falsely travel on the name and reputation of Intervenor's construction business in Cameroon, Africa.

4. Intervenor filed an adversary action against Belmar, as well as Teresa Santalucia, Varoujan Khorozian and Angela Khorozian a/k/a Aida Santalucia (“Aida”) for damages owing to Belmar’s filing of a false claim, as defined in 18 U.S.C. §152(4).

5. Intervenor also moved to amend its adversary complaint to add a theft count for said Defendants’ theft of the name and reputation of Consolidated Engineering Company, Inc., an asset owned by Debtor, which motion has as yet not been heard.

6. Despite its best efforts, Intervenor is encountering tactics by Defendants which are intended to thwart Debtor’s discovery. For instance, Aida promptly moved for protection when noticed for deposition, and Varoujan refused to answer any questions at his deposition which were intended to discover facts pertaining to Angela’s false identity as Aida. Teresa Santalucia, Angela/Aida’s mother claimed (but not until she appeared to be deposed) that she could not hear at her deposition, which was ordered to be re-set.

7. Intervenor believes that there is a substantial likelihood that there are facts which were discovered in this case which may provide further proof as to Angela’s false identity, but which are currently sealed pursuant to Court order.

8. Intervenor submits that orders sealing these facts were for convenience and entered in order that this matter proceed.

9. However, in the interest of justice, and now that matters have been determined in this case which is closed, it is necessary that these facts be brought to light.

10. Intervenor does not want the Court to unseal any information pertaining to the identity of Plaintiff in this action, whose information was sealed in order to assure her safety.

11. However, because Angela and Aida each insist in numerous forums and in business dealings within the United States and abroad that they are not one in the same person in

order to perpetuate numerous frauds, the unsealing of information about Angela Khorozian and Aida Santalucia best serves the public interest.

WHEREFORE, the undersigned requests that that Court permit his intervention for the purpose of unsealing discovery and other documents which pertain to Defendant Aida Santalucia, and that said information be unsealed.

/s/ Jeffrey M. Siskind
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing motion was served upon all appropriate parties this 25th day of August, 2017 by U.S. Mail to their counsel of record, as follows:

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